

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

AGENCY INSURANCE COMPANY OF  
MARYLAND,

Plaintiff,

v.

PLACIDA PAULINO and IDALIS  
PAULINO,

Defendants.

CIVIL ACTION NO. 3:21-cv-00767-  
MEM

FILED  
SCRANTON

AUG 26 2021

PER just  
DEPUTY CLERK

MOTION FOR EXTENSION OF TIME TO ANSWER

DEFENDANTS PLACIDA PAULINO AND IDALIS PAULINO respectfully request a 14-day extension of time to a respond to Plaintiff's complaint on the following grounds:

1. The current time to answer is Friday, August 27, 2021.
2. Until recently, the parties were discussing the possibility of a negotiated resolution.
3. Unfortunately, the settlement discussions were not successful.
4. Defendants have spoken to attorneys in Pennsylvania who will need a short time to prepare a response to the Plaintiff's complaint.
5. This motion is made in good faith and not for the purpose of delay but to allow counsel to prepare.

For these reasons, Defendants respectfully requests a 14-day extension of time, through and including September 10, 2021 to serve its response to Plaintiff's complaint.

Respectfully submitted,  
Dated: August 26, 2021

<b>DEFENDANTS</b>	
By: <u>Placida M. Paulino</u>	By: <u>Idalis Paulino</u>
Placida Paulino	Idalis Paulino